

BLANK ROME LLP
Attorneys for Defendants
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
New York, NY 10174
(212) 885-5000

UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK

EXMAR SHIPPING N.V.,

06 CIV 12991(HB)

Plaintiff,

v.

POLAR SHIPPING S.A., et al.,

Defendants.

**NOTICE OF MOTION UNDER RULE E OF THE
SUPPLEMENTAL RULES FOR CERTAIN
ADMIRALTY AND MARITIME CLAIMS AND
LOCAL ADMIRALTY RULE E.1 FOR VACATUR
OR REDUCTION OF PLAINTIFF'S MARITIME
ATTACHMENT AND, OR IN THE
ALTERNATIVE, FOR COUNTERSECURITY**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, Notice of Foreign Law, the Affidavit of Jeremy J.O. Harwood dated February 25, 2008 and Declaration of Nicholas Burgess dated February 15, 2008 and all the exhibits thereto, defendants, will move this Court before the Hon. Baer, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order

pursuant to Rule E(4)(f) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure vacating or reducing the amount of security and/or substitute security that Plaintiff has attached and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Date: New York, New York
February 25, 2008

Respectfully submitted,

BLANK ROME LLP

By: Jeremy J.O. Harwood
Jeremy J.O. Harwood
405 Lexington Avenue
New York, New York 10174
(212) 885-5000

Attorneys for Defendants